

## Permitting Workshop for Chrome Platers

### **Questions and Answers**

- 1) What kind of permit do I need?

Answer: A minor source operating permit will be issued to companies who operate hexavalent chromium electroplating, provided that the site is not classified as a major source. A registration will be issued to trivalent chrome platers not using any hexavalent chrome. A Title V permit will be issued to major sources subject to the chrome NESHAP (also known as the MACT standard).

- 2) How much will the permit cost?

Answer: A filing fee of \$100 needs to be submitted with the application. The annual fee for a minor source operating permit for hexavalent chrome plating is \$200. A one-time fee of an additional \$500 applies just to trivalent chrome platers.

- 3) Will all hard chrome platers eventually be required to obtain a Title V permit?

Answer: In the August 18, 1999 Federal Register, the U.S. EPA proposed to grant states the discretion to continue to defer Title V permitting for an additional five years. At that point it may be decided to subject area source hard chrome platers to Title V permitting. If the U.S. EPA exempts hard chrome plating from Title V permitting, as was done with some decorative chrome plating in 1996, this federal action would not directly affect state permitting requirements affecting all hexavalent chrome platers and anodizers in Indiana. For chrome plating operations not located at a major source, the less burdensome and less costly state permit may be more appropriate than a Title V permit.

- 4) What changes to the chrome plating process require IDEM approval, and which require only a notice be submitted?

Answer: For chrome platers who have a minor source operating permit, a permit application must be submitted to IDEM, and a permit issued, before equipment can be installed. These changes include: adding or replacing a tank whose limit was 0.030 mg/dscm, and therefore would be subject to a new limit of 0.015 mg/dscm; or, adding a new tank that will perform a different type of plating (e.g. hard chrome to decorative, and vice versa); or, changing the type of plating for existing tanks; or, adding or replacing a rectifier which causes the maximum cumulative potential rectifier capacity of hard chrome tanks to increase above the threshold of 60 million amp-hr/yr; and any other change that would apply different requirements from the NESHAP.

Certain changes may commence without IDEM approval, however, a notification must be submitted to IDEM within 30 days of making the change. Notice-only changes include: adding or replacing a tank of the same type of plating in which there are no additional or different requirements from applicable rules, and minor administrative changes such as descriptive information concerning the process.

- 5) I'm a trivalent plater using a wetting agent; what are my reporting, recordkeeping, and monitoring requirements?

Answer: The chrome NESHAP requires an initial notification, a statement that a wetting agent will be continuously used, and one recordkeeping requirement: a list of trivalent chrome bath components, with the wetting agent clearly identified. There are no testing, monitoring, and reporting requirements for trivalent chrome tanks. These provisions are described in §63.342(e) and §63.347(i).

- 6) Why do we need to get a permit?

Answer: The Air Pollution Control Board approved the permitting rules of Article 2, with the minor source operating permit program becoming effective on December 25, 1998. These permitting rules apply to all chrome electroplating and anodizing operations in Indiana. The permit is intended to assist chrome platers and anodizers in complying with the requirements of the NESHAP. The deadline for submitting an application is December 27, 1999.

- 7) Can you explain IDEM's justification for requiring permits?

Answer: The purpose of these permitting rules is more fully described in the August 1, 1997 and January 1, 1998 issues of the Indiana Register, and includes a summary of comments from the public, and IDEM's responses to both public comment periods. One reason for permitting all hexavalent chrome platers is because of the carcinogenic toxicity of chromium compounds and the close proximity of many of these sources to residential areas. Also, IDEM believes that a clear, concise, and site-specific document will in fact help companies avoid compliance problems that could ultimately result in much greater costs to the sources. IDEM's goal of sustaining the effectiveness of the state's chrome program over the long term is enhanced by a single reference document.